

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

JONATHAN REES, a/k/a GREG ELLIS,
a/k/a JONNY REES,

Defendant.

Case No.: 3:23-CV-1352 (TJM/ML)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Kenneth A. Caruso, and the accompanying Memorandum of Law, Plaintiff, Jane Doe (“Plaintiff”), will move this Court, at the U.S. Courthouse, 15 Henry Street, Binghamton NY 13901, on December 20, 2024, for an order, modifying the Court’s previous Order, ECF 71, and allowing Plaintiff to serve her motion for a default judgment upon Defendant by alternative means, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to N.D.N.Y. Local Rule 7.1(a)(1), papers in opposition to this motion must be filed on or before December 13, 2024.

Dated: November 22, 2024
New York, New York

Respectfully Submitted,

KENNETH CARUSO LAW LLC

By: /s/ Kenneth A. Caruso
Kenneth A. Caruso
15 W. 72nd Street
New York, NY 10023
(646) 599-4970
ken.caruso@kennethcarusolaw.com

LABKOWSKI LAW, P.A.

By: /s/ David Labkowski
David Labkowski

IT IS SO ORDERED:

Miroslav Lovric
Miroslav Lovric
U.S. Magistrate Judge

Dated: December 2, 2024
Binghamton, NY

250 95th Street, Unit #547233
Surfside, Florida 33154
(786) 461-1340
david@labkowskilaw.com

*Attorneys for Plaintiff,
Jane Doe*